

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE I and II, minors, by and through their mothers)
and next friends, MARY DOE I and II,)
Plaintiffs,)
v.)
THE BOARD OF EDUCATION OF THE CITY OF)
CHICAGO and CASINO CRUZ, in his individual capacity)
and as an employee of the CHICAGO PUBLIC SCHOOLS,)
Defendants.)

Case No: 1:18-cv-03201
Honorable Judge
Virginia M. Kendall

**AGREED MOTION SEEKING COURT APPROVAL OF THE PARTIES' RELEASE
AND SETTLEMENT AGREEMENT**

Defendant BOARD OF EDUCATION OF THE CITY OF CHICAGO ("Board") by its attorneys of record, and requests that this Honorable Court approve the aforementioned parties' fully executed Release and Settlement Agreement. The parties state as follows in support of their Agreed Motion:

1. Plaintiffs JANE DOE I and II, minors, by and through their mothers and next friends, MARY DOE I and II and Defendants BOARD and CASINO CRUZ (collectively the "Parties"), have fully executed a Release and Settlement Agreement ("Agreement"). Because the Agreement involves minors, the Parties seek the Court's approval pursuant to Local Rule 17.1.
2. Said Agreement was provided to the Court for review via email through the Court's proposed order inbox e-mail address on September 12, 2019.

WHEREFORE, Plaintiffs JANE DOE I and II, minors, by and through their mothers and next friends, MARY DOE I and II and Defendants BOARD and CASINO CRUZ respectfully request that this Honorable Court grant their request to approve their fully executed Release and Settlement Agreement.

Respectfully submitted,

**DEFENDANT BOARD OF EDUCATION FOR
THE CITY OF CHICAGO**

JOSEPH MORIARTY,
General Counsel

By: /s/ Susan Best
Susan J. Best
Assistant Deputy General Counsel
Board of Education of the City of Chicago
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on September 12, 2019, she served the foregoing document, Agreed Motion to Approve Settlement Agreement, via electronic filing, upon all parties with an appearance on file.

/s/ Kathryn Kohls
Kathryn Kohls